

Shephard, Burt

From: John Toll <JohnT@windwardenv.com>
Sent: Tuesday, March 04, 2014 12:43 PM
To: Shephard, Burt
Cc: jworonets@anchorqea.com; James McKenna
Subject: RE: Maybe the answer to the bird egg DDx PRG question

Thanks Burt. Following this line of reasoning, then, the bird egg PRG isn't needed, right? John

From: Shephard, Burt [mailto:Shephard.Burt@epa.gov]
Sent: Tuesday, March 04, 2014 3:41 PM
To: John Toll
Subject: Maybe the answer to the bird egg DDx PRG question

Without checking my notes, what I think may have happened is I forgot the bald eagle is no longer a T&E species in Oregon, thus, we no longer used the NOAEL TRVs in the final BERA for the risk characterization, only the higher LOAEL TRVs. DDx carried through the BERA using the NOAEL TRVs for bald eagle, but not using the LOAEL DDx TRVs. Calculating bald eagle risks using only LOAEL TRVs was a change EPA agreed to between the draft and final BERA.

When discussing the basis for FS PRGs with Kristine, Bruce Duncan and I convinced her that the osprey was a better species to use for an in water FS than the bald eagle, given the dietary preferences of the two birds. This was even though the calculated PRGs were lower for DDx for bald eagle than the osprey DDx PRG. Osprey, being essentially an obligate piscivore is a more ecologically supportable basis for an in water PRG than bald eagle, which can be more of a generalist in its diet, feeding on voles, birds and other terrestrial species, as well as fish. So we went with the osprey even though it didn't result in the lowest PRG, forgetting that it didn't carry through to the end of the BERA using LOAEL DDx TRVs.

Best regards,

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"Facts are stubborn things"
- John Adams